IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Rodrick Ray Blue, Debtor

Case No. 25-01244-JAW

CHAPTER 7

NOTICE OF MOTION TO PARTIALLY AVOID JUDICIAL LIEN

YOU ARE HEREBY NOTIFIED that a Motion to void the Judgment Lien of One Main Finacial Group, LLC has been filed on behalf of Rodrick Ray Blue.

YOU ARE HEREBY FURTHER NOTIFIED that TWENTY-ONE (21) DAYS from the date of this Notice are granted in which a written objection or other responsive pleading must be filed with the Clerk, U.S. Bankruptcy Court, Southern District of Mississippi, Thad Cochran United States Courthouse, 501 E. Court St., Suite 2.300, Jackson, MS 39201; and with the undersigned attorney for the Trustee at the address listed below. If no objections are filed, the Court may consider this matter EX PARTE. Should objections be filed, a hearing will be held on the aforesaid Motion at a date to be later determined by the Court.

Date: July 18, 2025 Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer A Curry Calvillo (MSBN 104367) The Rollins Law Firm, PLLC

PO Box 13767 Jackson, MS 39236

601-500-5533

trollins@therollinsfirm.com

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Rodrick Ray Blue, Debtor

Case No. 25-01244-JAW

CHAPTER 7

MOTION PARTIALLY AVOIDING JUDICIAL LIEN

COMES NOW, Debtor, by and through counsel, pursuant to 11 U.S.C. §522(f) and Bankruptcy Rule 4003(d), and files this his Motion to void the Judgment Lien of One Main Financial Group, LLC ("Respondent"), and in support thereof, would show the Court as follows:

I.

Debtor commenced this proceeding under Chapter 7 of the Bankruptcy Code on 05/15/2025.

I.

That the Debtor has a Judgment Lien against him obtained by Onemain Financial Group, LLC entered in the Circuit Court of Rankin County, Mississippi, in the amount of \$1,648.00 enrolled in the Judgement Roll maintained by the Rankin County Circuit Clerk and filed under file number 61CI1:05-jf-06944, on his homestead located at 1648 C Holly Bush Rd., Pelahatchie, MS 39145 being more fully described as follows:

Beginning at the northeast corner of the S ½ of NE ¼ of NE ¼ of Section 3, Township 6 North, Range 4 East and running thence South 210 feet; thence West parallel with the North line of said S ½ of NE ¼ of NE ¼ distance of 210 feet to the North line of said S ½ of NE ¼ of NE ¼ thence East along the North line of said S ½ of NE ¼ of NE 1/4 a distance of 420 feet to the point beginning: containing two (2) acres, more or less, and being situated in the S ½ of NE ¼ of NE ¼ of Section 3, Township 6 North Range 4 East.

II.

That the Debtor seeks an Order from this Court voiding the judgment listed in Paragraph II. above to the extent it is a lien against his homestead and impairs the debtor's right to claim his homestead exemption pursuant to §85-3-21, Mississippi Code of 1972.

WHEREFORE, Debtor respectfully requests that this Court enter an order voiding the lien of Onemain Financial Group, LLC against him which impairs his homestead exemption, and for such other relief as is deemed just.

Dated July 18, 2025

Respectfully submitted,

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer A Curry Calvillo (MSBN 104367) The Rollins Law Firm, PLLC PO Box 13767 Jackson, MS 39236 601-500-5533 trollins@therollinsfirm.com

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above Motion to Partially Avoid Lien was forwarded on July 18, 2025, to the creditor, case trustee and U.S. Trustee as indicated in the "21 day notice" that accompanies this Objection.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice of Right to Request Hearing and Motion to Partially Avoid Lien was forwarded on July 18, 2025, to:

By First Class U.S. Mail, Postage Prepaid:

Onemain Financial Group, LLC c/o C.T. Corporation System 645 Lakeland Drive East Dr Ste. 101 Flowood, MS 39232

One Main Financial Attn: Bankruptcy P.O. Box 142 Evansville, IN 47701

By Electronic CM/ECF Notice:

Case Trustee U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4	UNITED STATES BANKRUPTCY COURT
5	SOUTHERN DISTRICT OF MISSISSIPPI
6	IN RE: CASE NO: 25-01244
7	Rodrick Ray Blue DECLARATION OF MAILING CERTIFICATE OF SERVICE
8	Chapter: 13
9	
10	
11	On 7/18/2025, I did cause a copy of the following documents, described below,
12	Notice and Motion to Partially Avoid Judicial Claim
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18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
21	Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
23	served electronically with the documents described herein per the ECF/PACER system. DATED: 7/18/2025
24	/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr.
25	The Rollins Law Firm
26	702 West Pine St Hattiesburg, MS 39401
27	601 500 5533 trollins@therollinsfirm.com
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25-01244-JAW Dkt 17 Filed 07/18/25 Entered 07/18/25 16:21:59 Page 5 of 7

	25-01244-JAW Dkt 17 Filed 07/18/25 Entered 07/18/25 16:21:59 Page 6 of 7
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3	UNITED STATES BANKRUPTCY COURT
4	SOUTHERN DISTRICT OF MISSISSIPPI
5	IN RE: CASE NO: 25-01244
6	Rodrick Ray Blue CERTIFICATE OF SERVICE
7	DECLARATION OF MAILING Chapter: 13
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11	On 7/18/2025, a copy of the following documents, described below, Notice and Motion to Partially Avoid Judicial Claim
12	Notice and Motion to Partially Avoid Judicial Claim
13	
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19	were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
20	herein. The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
21	referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.
22	DATED: 7/18/2025
24	
25	Will The
26	Miles Wood BK Attorney Services, LLC
27	d/b/a certificateofservice.com, for Thomas C. Rollins, Jr.
28	The Rollins Law Firm 702 West Pine St
	Hattiesburg, MS 39401

25-01244-JAW Dkt 17 Filed 07/18/25 Entered 07/18/25 16:21:59 Page 7 of 7

USPS FIRST CLASS MAILING RECIPIENTS: Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

ONEMAIN FINANCIAL GROUP, LLC C/O C.T. CORPORATION SYSTEM 645 LAKELAND DRIVE EAST DR STE. 101 FLOWOOD MS 39232 FIRST CLASS

ONE MAIN FINANCIAL ATTN: BANKRUPTCY P.O. BOX 142 EVANSVILLE IN 47701